

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JPMORGAN CHASE BANK, N.A.,

Plaintiff/  
Counter-Defendant,

Case No. 2:08-cv-13845

v

Hon. Avern Cohn  
Magistrate Judge: Michael J. Hluchaniuk

LARRY J. WINGET and the  
LARRY J. WINGET LIVING TRUST,

Defendants/  
Counter-Plaintiffs.

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**DEFENDANTS' DISCLOSURE PURSUANT TO THE  
COURT'S JANUARY 21, 2011 ORDER (DKT. NO. 158)**

As required by the Court's January 21, 2011 Order, Defendant hereby advises Plaintiff as follows with regard to the "record books" of companies owned or controlled by Larry J. Winget

or the Larry J. Winget Living Trust between May 2002 and October 2002 (hereinafter, the “relevant entities”):

1. **Golf Course Properties:** The entities charged with responsibility for maintaining the “record books” of all golf course properties properly categorized as “relevant entities” have been contacted and asked to promptly produce, to the extent they exist, all “record books.” As of this disclosure, Defendants have been advised that Wyngate will be producing documents to counsel for Plaintiff which may constitute “record books” of that golf course property. To the extent they are responsive, those documents will be promptly produced following privilege review. Defendant will keep Plaintiff apprised of any additional information received from the remaining golf course properties that are properly categorized as “relevant entities.”

2. **Universal Venture Automotive (“UVA”):** While Defendants believe the categorization of UVA as a “relevant entity” is questionable, out of an abundance of caution, it has requested production of the “record books” of that entity. As of this writing, those “record books” have been received by counsel for Defendant and will be produced promptly following privilege review.

3. **Center for Lean Manufacturing:** As of this writing, those “record books” have been received by counsel for Defendants and will be produced promptly following privilege review.

4. **MGT Construction:** The entity charged with responsibility for maintaining the “record books” of MGT Construction, to the extent they exist, has been contacted and asked to promptly produce all “record books.” Upon receipt (assuming their existence) those documents will be promptly produced following privilege review by counsel for Defendants.

5. **Venture Desallardora:** As of this writing, those “record books” have been received by counsel for Defendants and will be produced promptly following privilege review.

6. **Millard ESP:** The entity charged with responsibility for maintaining the “record books” of Millard ESP, to the extent they exist, has been contacted and asked to promptly produce all “record books.” Upon receipt (assuming their existence), those documents will be promptly produced following privilege review by counsel for Defendants.

7. **Venture Australia Unit Trust:** The entity charged with responsibility for maintaining the “record books” of Venture Australia Unit Trust, to the extent they exist, has been contacted and asked to promptly produce all “record books.” Upon receipt (assuming their existence), those documents will be promptly produced following privilege review by counsel for Defendants.

8. **Venture Asia Pacific Pty Ltd:** The entity charged with responsibility for maintaining the “record books” of Venture Asia Pacific Pty. Ltd., to the extent they exist, has been contacted and asked to promptly produce all “record books.” Upon receipt (assuming their existence), those documents will be promptly produced following privilege review by counsel for Defendants.

9. **Venture South Africa:** The entity charged with responsibility for maintaining the “record books” of Venture South Africa, to the extent they exist, has been contacted and asked to promptly produce all “record books.” Upon receipt (assuming their existence), those documents will be promptly produced following privilege review by counsel for Defendants.

10. **Venture Foreign Sales Corp:** No “record books” for this entity exist.

The entities listed above are the only "relevant entities" for which "record books" have not been produced to Plaintiff. To the extent additional relevant information is received by Defendants related to the production of "record books" of "relevant entities" subsequent to this filing, Defendants will provide that information promptly to Plaintiff, and/or will produce responsive "record books" received promptly following privilege review.

Dated: February 16, 2011

/s/ John E. Anding  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2011, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

Dated: February 16, 2011

/s/ John E. Anding  
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